

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2019-281-S**

IN RE:	)	<b>AFFIDAVIT OF LAUREN B.</b>
	)	<b>HUTSON IN SUPPORT OF MOTION</b>
Application of Palmetto Utilities, Inc. for	)	<b>TO STRIKE PORTIONS OF THE</b>
adjustment of rates and charges for, and	)	<b>PRE-FILED DIRECT TESTIMONY</b>
modification to certain terms and conditions	)	<b>AND EXHIBITS OF CHARLES E.</b>
related to the provision of sewer service.	)	<b>LOY AND FOR IMPOSITION OF</b>
	)	<b>SANCTIONS</b>

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Personally appeared before me, Lauren B. Hutson who, being duly sworn, affirms and swears as follows:

1. I am in excess of eighteen years of age and competent to give this affidavit.
2. I am a 2012 graduate of the University of South Carolina with master's degrees in accountancy and business administration. Since 2015, I have been employed by Ni Pacolet Milliken Utilities, LLC, first as a senior financial analyst and currently as manager of financial planning and analysis. In my current capacity, I am responsible for developing the initial drafts of responses to demands for books, records, and other information issued by the South Carolina Office of Regulatory Staff ("ORS") pursuant to S.C. Code Ann. §58-4-55 and to responses to discovery requests propounded by parties of record pursuant to S.C. Code Regs. 103-833 in contested case proceedings involving Palmetto Wastewater Reclamation LLC and Palmetto Utilities, Inc. ("PUI"). I coordinate with management and legal counsel as to the content of such responses and requests and ensure timely delivery of same.
3. In the above-captioned proceeding, there were a total of four hundred sixteen (416) separate demands (including subparts) for the production of books, records or other information made upon PUI by ORS pursuant to §58-4-55. Timely responses, supplemental responses, or objections were submitted to ORS for each of these 416 demands, most often within five (5) business days. Of this number, ORS Senior Regulatory Analyst Daniel P. Hunnell, II, issued one-

hundred seventy (170) of these demands for production under the title “Water Operations Requests.” Many of Mr. Hunnell’s demands for production were duplicative of demands for production made by other ORS personnel or sought matter not constituting books, records or other information of PUI to which the company objected.

4. A meeting was arranged with ORS personnel to discuss the demands made of PUI by ORS under §58-4-55, specifically including the first one hundred fourteen (114) demands issued by Mr. Hunnell. This meeting was held on February 19, 2020, at ORS’s office in Columbia. In addition to myself, Mark S. Daday, President and Chief Financial Officer of Ni Pacolet Milliken Utilities, LLC, and PUI legal counsel, John M. S. Hoefer, attended for PUI. Present at this meeting for ORS were Executive Director Nanette S. Edwards, Director of Utility Rates and Services Ryder Thompson, Chief Legal Officer Jeffrey Nelson, Counsel Jenny Pittman, and Counsel Christopher Huber. Mr. Hunnell was not, however, in attendance. At this meeting, Mr. Daday and Mr. Hoefer expressed concern to ORS regarding the number, scope, and extent of the demands issued by Mr. Hunnell. No one from ORS at this meeting asserted that PUI’s production was deficient or expressed disagreement with any of the objections made by PUI.

5. Subsequent to this February 19, 2020, meeting, Mr. Hunnell issued another fifty-six- (56) demands for production to PUI in this matter. I have reviewed Mr. Hunnell’s unredacted pre-filed direct testimony and exhibits submitted to the Commission and served on the parties via electronic mail on May 26, 2020, at approximately 2:00 p.m. and his redacted pre-filed testimony and exhibits filed with the Commission and served on the parties at approximately 5:25 p.m. on May 26, 2020. I have also reviewed the pre-filed direct testimony and exhibits of Charles E. Loy that was submitted to the Commission at the same time and in the same manner and filed with the Commission and re-served on the parties at approximately 5:25 p.m. on May 26, 2020. In these testimonies, Mr. Hunnell and Mr. Loy recite, describe, refer to, or attach thirty-one (31) demands for production made by ORS after February 19, 2020, and PUI’s response to one (1) demand made prior to that date.

6. On several occasions, ORS Audit Coordinator and witness Christina L. Seale would follow up on PUI’s production with questions which I answered. At no time, however, did Ms.

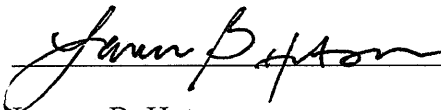
Seale or anyone else at ORS assert to me that PUI's production was deficient or express to me disagreement with any of the objections made by PUI.

7. Notwithstanding the stay issued by the Commission of all proceedings in this docket, PUI responded to seven (7) additional demands for production made by ORS on and after March 26, 2020.

8. From and since the filing of the application in this matter, PUI has paid \$36,851.25 to Mr. Loy's employer, GDS Associates, Inc. for services provided to ORS. In addition, PUI is in receipt of a copy of an invoice from GDS Associates, Inc. to ORS dated May 20, 2020, in the amount of \$3,415.00 for services rendered through April 24, 2020, which amount PUI has not yet paid.

PURSUANT TO SECTION (c)(16) OF ORDER 2020-04-03-01 OF THE SOUTH CAROLINA SUPREME COURT AND COMMISSION ORDER 202-391, I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT BY CONTEMPT.

FURTHER AFFIANT SAYETH NAUGHT.

  
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Lauren B. Hutson

Dated this 1<sup>st</sup> day of June, 2020

Columbia, South Carolina

Martha Stone Tuttle  
Notary Public, State Of South Carolina  
My Commission Expires October 2, 2025

